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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the application of : O Friel et al
Serial No. : 09/935,253
Filed : August 22, 2001
For : Contacting a Destination Terminal From an
Originating terminal via a Packet-Based
Communications Network
Examiner : Joo, Joshua
Art Unit : 2154
Customer number : 23644

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Signature Minnie Wilson

APPEAL BRIEF

Honorable Director of Patents and Trademarks
PO Box 1450
Alexandria, VA 22313-1450

Dear Sir:

This appeal is from the Examiner's final Office Action mailed April 21, 2005
and the Advisory Action mailed July 12, 2005 in which all pending claims (namely
Claims 1, 3, 5-10 and 10-28) were rejected. A timely Notice of Appeal was filed with
the required fee.

10/25/2005 HTECKLU1 00000030 09935253

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This brief is being filed along with the required \$500 fee pursuant to 37 C. F. R. § 41.20(b)(2).

(i) Real Party in Interest

This application is assigned to Nortel Networks Limited. The assignments are recorded at Reel/Frames: 012433/0731, 012433/0741, and 012433/0834.

(ii) Related Appeals and Interferences

There are no related appeals or interferences.

(iii) Status of Claims

This application was filed with claims 1 to 28. In the response of March 8, 2005 and June 21, 2005, claims 2, 4 and 11 were cancelled and claims 1, 5-9, 18-23 and 27-28 amended. During amendment, independent claims 1, 18, 22, 27 and 28 have each been amended to recite the limitation of claim 2 (now cancelled).

(iv) Status of Amendments

Further amendments to the claims were made in the response of June 21, 2005, which response was entered by the Examiner, so the claims now pending have all been considered by the Examiner and finally rejected. It is the rejection of these claims as set forth in the Advisory Action mailed July 12, 2005 that is appealed. All the pending claims 1, 3, 5-10 and 10-28 as amended during the prosecution of the application, are set forth in the Claims Appendix.

(v) Summary of Claimed Subject Matter

The invention as presently claimed is concerned with packet-based communications networks (such as Voice over Internet Protocol (VoIP) networks) which support two or more zones (eg different geographical regions used by one or more enterprises). Each zone will have a number terminals (such as IP telephones) connected to a number of gateways (such as ITU-T H.323 compliant gateways) which enable the terminals to access the network. In particular, the invention as presently claimed addresses the problem of how communications (such as IP telephony calls) between such terminals may be enabled, with little or no repetitive configuration of gateways, while allowing for the fact that telephone numbers (or other identifiers) may be repeated in different zones of the network (for example, the telephone number "1234" may be used in two zones of an enterprise). In realistically sized networks, configuration of a dialling plan (ie the association between terminals/gateways and telephone numbers) has hitherto been a repetitive, error-prone, expensive and time-consuming task. These problems are exacerbated in the case of telephone numbers being repeated in multiple zones.

The solution of the invention, as set out in claim 1 for example, is to use a gatekeeper (such as ITU-T H.323 compliant gatekeeper) to provide some of the information needed to establish communications. To enable an originating terminal (eg a calling party's IP telephone) to establish communications (eg an IP telephony call) with a destination terminal (eg a called party's IP telephone), a request is made to a gatekeeper. An originating gateway (associated with the originating terminal) requests from the gatekeeper the packet network address of another gateway (which can be contacted to reach the destination terminal) so that it can establish such communications. The request includes an identifier of the destination terminal (eg telephone number). In response, the gatekeeper provides a packet network address (eg an IP address) of the other gateway (a destination gateway) thus enabling the

originating gateway to establish communications between the originating and destination terminals. By using a gatekeeper to provide this information, repetitive configuration of all of the numerous gateways in each of the different zones of the network is avoided. Thus, configuration of a dialling plan in realistically sized networks, especially where telephone numbers are repeated across multiple zones is made easier.

(vi) Grounds of Rejection To Be Reviewed on Appeal

There are four rejections at issue:

1. the rejection of claim 21 under 35 USC §112 as being indefinite;
2. the rejection of independent claims 1, 22, and 28 under 35 USC §103(a) as being obvious over O'Brien Jr (US Patent Application Publication number 2003/0031165) in view of Donovan (US Patent Number 6,480,588), further in view of Dorenbosch (US Patent 5,959,546); and yet further in view of Famolari (US Patent number 6,611,510) (cited for the first time in the most recent Advisory Action mailed July 12, 2005);
3. the rejection of independent claims 18 and 27 under 35 USC §103(a) as being obvious over O'Brien Jr (US Patent Application Publication number 2003/0031165) in view of Ng (US Patent Number 6,791,970), further in view of Dorenbosch (US Patent 5,959,546); and yet further in view of Famolari (US Patent number 6,611,510) (cited for the first time in the most recent Advisory Action mailed July 12, 2005); and
4. the rejection of the remaining dependent claims under 35 USC §103(a) as being obvious over the above cited prior art references (as appropriate) and, variously, further in view of the following five additional prior art references: Haga (US Patent Number 6,366,576); Tomoike (US Patent Number 5,940,512); Sorrentino (US Patent

Publication Number 2002/0064151); Mussman (US Patent Publication Number 2002/0159440); and Thompson III (US Patent Publication Number 2002/0154751).

(vii) Argument

Ground 1:

It is believed that this rejection has been overcome by the amendment of claim 21 in the response of June 21, 2005, although the Examiner has not confirmed this.

Grounds 2-4:

Two preliminary points relating to grounds or rejections 2-4 are apparent:

Firstly, it will be immediately apparent that there are a very large number of prior art references cited in the course of the Examiner's rejection of the pending claims as being obvious under 35 USC §103(a). This is true both in respect of individual claims (for example independent claims 1, 18, 22, 27 and 28 each have **four** prior art references cited in combination), and also in respect of the claims as a whole (there are a total of **ten** prior art references cited altogether). While it is appreciated that, as a matter of law, a large number of references on its own does not weigh against the obviousness of a claimed invention, in complex areas of technology, such as telecommunications, clear and detailed grounds for establishing a *prima facie* case of obviousness by must be made especially when combining large numbers of references. It will be apparent from the following that the Examiner has failed to substantiate such grounds.

Secondly, it will also be apparent that procedure has been abused in the course of the examination. The prior art reference Famolari is cited for the first time in the most recent Advisory Action mailed July 12, 2005 (ie after the final Office Action mailed April 21, 2005 and after the Appellants' response dated June 21, 2005). Famolari is cited as allegedly providing the teaching, suggestion or motivation to make the combination of prior art references O'Brien Jr, Donovan and Dorenbosch

which teaching, suggestion or motivation is required, as a matter of law, to establish a *prima facie* case of obviousness. As a result, the Appellants have not been given the proper opportunity in the first instance to even address this allegation and this has necessitated the filing of this appeal.

The Examiner failed to withdraw the finality of the previous Office Action and issue a new and non-final Office Action as he should have done when citing a prior art reference for the first time. (Note that the Appellants' latest claim amendments, made in the response dated June 21, 2005 to the final Office Action mailed April 21, 2005, were merely to limit independent claims to include the feature of an original dependent claim and make other typographical and clarity corrections. In any event, the response dated June 21, 2005, and its claim amendments, were entered by the Examiner and thus were not considered to have raised any new issues which might have necessitated the citation of a new prior art reference).

In conclusion, the Appellants have been deprived of the right to a full and fair hearing contrary to MPEP § 706.07.

Ground 2:

The Examiner has rejected independent claims 1, 22, and 28 under 35 USC §103(a) as being obvious over O'Brien Jr, in view of Donovan, further in view of Dorenbosch, and yet further in view of Famolari.

In *ex parte* examination of patent applications, the Patent and Trademark Office bears the burden of establishing a *prima facie* case of obviousness. MPEP § 2142; *In re Fritch*, 972 F.2d 1260, 1262, 23 U.S.P.Q.2d 1780, 1783 (Fed. Cir. 1992). The initial burden of establishing a *prima facie* basis to deny patentability to a claimed invention is always upon the Patent and Trademark Office. MPEP § 2142; *In re Oetiker*, 977 F.2d 1443, 1445, 24 U.S.P.Q.2d 1443, 1444 (Fed. Cir. 1992); *In re*

Piasecki, 745 F.2d 1468, 1472, 223 U.S.P.Q. 785, 788 (Fed. Cir. 1984). Only when a *prima facie* case of obviousness is established does the burden shift to the applicant to produce evidence of non-obviousness. MPEP § 2142; *In re Oetiker*, 977 F.2d 1443, 1445, 24 U.S.P.Q.2d 1443, 1444 (Fed. Cir. 1992); *In re Rijckaert*, 9 F.3d 1531, 1532, 28 U.S.P.Q.2d 1955, 1956 (Fed. Cir. 1993). If the Patent and Trademark Office does not produce a *prima facie* case of unpatentability, then without more the applicant is entitled to grant of a patent. *In re Oetiker*, 977 F.2d 1443, 1445, 24 U.S.P.Q.2d 1443, 1444 (Fed. Cir. 1992); *In re Grabiak*, 769 F.2d 729, 733, 226 U.S.P.Q. 870, 873 (Fed. Cir. 1985). A *prima facie* case of obviousness is established when the teachings of the prior art itself suggest the claimed subject matter to a person of ordinary skill in the art. *In re Bell*, 991 F.2d 781, 783, 26 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1993).

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed invention and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. MPEP § 2142.

Appellants deny that one skilled in the art would be motivated to combine the teachings of O'Brien, Donovan and Dorenbosch as alleged by the Examiner.

O'Brien is concerned with authorization of calls made over a VoIP network (see abstract). Donovan is in a similar field (providing VoIP telephone services) but relates to enabling prepaid telephone services. In stark contrast, Dorenbosch concerns a pager network in which a pager may roam (i.e. move into a new radio

access coverage area) from a home zone to a foreign zone. The roaming pager may have the same short address as another pager in the foreign zone in which it is roaming, but is prevented from decoding broadcast messages due to differences in the Simulcast System Identifiers (SSIDs) assigned to the different zones.

Appellants believe that one skilled in the art would never seriously consider combining teachings in a patent directed to addressing in wireless pagers with teachings in a patent and patent application directed to VoIP networks. In particular, it is noted that pagers use circuit-switched network technology whereas voice over IP networks are packet-switched. Furthermore, pagers are unidirectional receive-only devices which are unable to receive voice or any media other than simple text messages. Voice over IP networks are, as their name suggests, able to handle voice media amongst other things and in a bi-directional manner. There is the concept of a “call” between two or more terminals in voice over IP networks, whereas pagers cannot provide any call functionality.

In the final Office Action mailed April 21, 2005, at paragraph 20, the Examiner argues that “it would have been obvious to one of ordinary skill in the art at the time the invention was made to modify O'Brien's invention with Dorenbosch's invention for terminals to have a common address because it would improve the capability of O'Brien's invention by providing simultaneous transfer of media to multiple locations of the same identification.” Appellants pointed out in the response of June 21, 2005 that there was no evidence in the prior art, as required as a matter of law, of this teaching, suggestion or motivation. In response to this, the Examiner has cited Famolari in the Advisory Action mailed July 12, 2005. The Examiner alleges that Famolari teaches the “assigning of the same multicast address to different terminals in different domains in order to provide broadcast messages to a plurality of terminals”. This is therefore alleged to provide the teaching, suggestion or motivation to combine the teachings of O'Brien, Donovan and Dorenbosch.

Apart from the procedural incorrectness of citing Famolari as explained above, Appellants deny that Famolari provides any teaching, suggestion or motivation that would lead one skilled in the art to combine the teachings of O'Brien, Donovan and Dorenbosch.

Firstly, as explained above, O'Brien and Donovan are in the field of VoIP telephony networking but, in contrast, Dorenbosch concerns a circuit-switched, text message, receive-only pager network. Appellants contend that clear and detailed evidence of specific teaching, suggestion or motivation that would lead one skilled in the art to combine these disparate references would be necessary to overcome the natural assumption that no skilled person would ever contemplate such a technologically dysfunctional combination. The teaching of Famolari does not provide this clear and detailed evidence.

Secondly, Appellants deny that the teaching of Famolari is at all relevant to the teachings of O'Brien, Donovan and Dorenbosch. The alleged teaching of Famolari relates to multicast addressing which is a feature of some packet-switched networks. Multicast addressing enables, for example, a transmitting terminal to send (ie multicast) packets simultaneously to a number of receiving terminals. Thus, point to multipoint, or multipoint to multipoint, communications (eg VoIP conference calls between three or more users) is made straightforward from an addressing perspective. Neither the present invention, nor any of the prior art references, is concerned with such technology. O'Brien is concerned with authorization of calls made over a VoIP network. Donovan is concerned with prepaid telephony services over a VoIP network. Dorenbosch is concerned with circuit-switched, unidirectional, receive-only pagers. Appellants fail to understand what relevance the teaching of Famolari has to these references. Moreover, what relevance does it have to the present invention?

Accordingly, Appellants firmly believe that one skilled in the art would not be motivated to combine the teachings of O'Brien, Donovan and Dorenbosch as alleged by the Examiner.

To establish a *prima facie* case of obviousness, there must be also a reasonable expectation of success that the combination would work.

Appellants deny that there would be any expectation of success given the entirely different technologies of O'Brien and Donovan on the one hand and Dorenbosch on the other. As explained above, pagers use circuit-switched network technology whereas voice over IP networks are packet-switched. Furthermore, pagers are unidirectional, receive-only devices which are unable to receive voice or any media other than simple text messages. Voice over IP networks are, as their name suggests, able to handle voice media amongst other things and in a bi-directional manner. There is the concept of a "call" between two or more terminals in voice over IP networks, whereas pagers cannot provide any call functionality.

The Examiner has failed to provide evidence of any alleged reasonable expectation on the part of one skilled in the art that a combination of O'Brien, Donovan, and Dorenbosch would succeed, despite being requested to do so in the Appellants response of June 21, 2005.

To establish a *prima facie* case of obviousness, the prior art references when combined must teach or suggest all the claim limitations.

Appellants deny that Dorenbosch teaches the feature of

"said communications network comprises a first zone and a second zone each comprising a plurality of terminals connected to a plurality of gateways and

wherein a plurality of the terminal identifiers of the first zone are also used for terminals of the second zone”.

On any reasonable interpretation of the above-mentioned feature, terminal identifiers are repeated for both first terminals in the first zone and second terminals in the second zone. The terminals are different terminals and are in different zones but have the same terminal identifier.

In clear contrast, Dorenbosch teaches a pager network in which a pager may roam (i.e. move into a new radio access coverage area) from a home zone to a foreign zone. In particular, Dorenbosch teaches preventing decoding of messages to a single pager which roams from a home zone to a foreign zone. The pager may share the same short address as another pager in the foreign zone, but is prevented from decoding broadcast messages due to differences in the Simulcast System Identifiers (SSIDs) assigned to the different zones and pagers for which those zones are the home zone. Thus, in reality, the pagers do not share the same address when the difference in the SSID is also considered. Thus, Dorenbosch fails to teach the limitation that terminal identifiers are repeated for different terminals in different zones on any reasonable interpretation of the claim feature.

In the Advisory Action mailed July 12, 2005, the Examiner argues that although the Simulcast System Identifiers (SSIDs) assigned to the different zones (“tags” as he refers to them) are different for i) a pager roaming from a home zone to a foreign zone and ii) a “native” pager of the foreign zone, the short addresses may be the repeated. The Examiner goes on to argue that the “tags” of Dorenbosch are used in a similar manner to the gateways of the present invention – ie so that the pagers can receive the messages. Appellants cannot understand this statement. The Simulcast System Identifiers (SSIDs) – “tags” – are items of data associated with pagers. Gateways are physical apparatuses of a network. To equate them is like equating a

postal address with a road junction. Moreover, what is the relevance of this statement?

In summary, Applicants submit that the Examiner has failed to establish a prima facie case of obviousness and that, in fact, the inventions as presently defined in independent claims 1, 22 and 28, are both novel and non-obvious in view of the prior art references raised.

Ground 3:

The Examiner has rejected independent claims 18, and 27 under 35 USC §103(a) as being obvious over O'Brien Jr, in view of Ng, further in view of Dorenbosch, and yet further in view of Famolari. Thus, in comparison to the rejection of claims 1, 22, and 28, Donovan is replaced by Ng.

Ng relates to establishing communications between an IP telephony device such as a PC phone and a PSTN telephone. It can thus be considered to be in the same field as O'Brien Jr, and Donovan.

Claims 18, and 27 relate to the same overall invention as claims 1, 22, and 28. Whereas, on the one hand, claim 1 recites a method involving a gateway, claim 22 recites a gateway and claim 28 recites a computer program for controlling a gateway, on the other hand, claim 18 recites a gatekeeper and claim 27 a computer program for controlling a gatekeeper. Each of these claims recites substantially the same limitations, albeit reflecting the different perspectives of the different categories of method, apparatus and computer program, and the different perspectives of gateway and gatekeeper.

Accordingly, all the arguments presented above in section 8.3 concerning the rejection of claims 1, 22, and 28, apply equally to the rejection of claims 18, and 27.

In summary, Applicants submit that the Examiner has failed to establish a prima facie case of obviousness and that, in fact, the inventions as presently defined in independent claims 18 and 27, are both novel and non-obvious in view of the prior art references raised.

Ground 4:

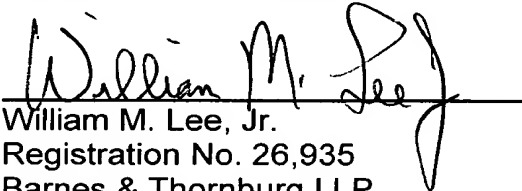
The Examiner has rejected the remaining dependent claims under 35 USC §103(a) as being obvious over the above cited prior art references (as appropriate) and, variously, further in view of the following five additional prior art references: Haga (US Patent Number 6,366,576); Tomoike (US Patent Number 5,940,512); Sorrentino (US Patent Publication Number 2002/0064151); Mussman (US Patent Publication Number 2002/0159440); and Thompson III (US Patent Publication Number 2002/0154751).

The rejection of dependent claims is moot in view of the above arguments.

Reversal of the Examiner is therefore clearly in order and is solicited.

October 21, 2005

Respectfully submitted,


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Claims Appendix

1. A method of determining a packet network address of at least one gateway which can be contacted to reach a destination terminal from an originating terminal via a packet-based communications network, the network comprising a plurality of terminals connected to a plurality of gateways and further comprising a gatekeeper, said gatekeeper having information about each gateway, said information comprising an identifier for each terminal connected to that gateway and a packet network address for that gateway, said method comprising the steps of:-

- (i) sending a request from an originating gateway connected to the originating terminal to the gatekeeper, said request comprising the identifier of the destination terminal;
- (ii) receiving a reply at the originating gateway from the gatekeeper said reply comprising the packet network address of at least one and possibly more of the gateways which can be contacted to reach the destination terminal;

wherein said communications network comprises a first zone and a second zone each comprising a plurality of terminals connected to a plurality of gateways and wherein a plurality of the terminal identifiers of the first zone are also used for terminals of the second zone.

2. (cancelled)

3. A method as claimed in claim 1 wherein said reply comprises information about only one gateway which is in the same zone as the originating terminal.

4. (cancelled)

5. A method as claimed in claim 1 wherein said reply is provided by the gatekeeper on the basis of the destination terminal identifier.
6. A method as claimed in claim 1 wherein said request further comprises the packet network address of the originating gateway.
7. A method as claimed in claim 6 wherein said reply is provided by the gatekeeper on the basis of the unique label of the originating gateway as well as the destination terminal identifier.
8. A method as claimed in claim 1 wherein if the destination terminal identifier occurs in both zones, the reply received specifies that a gateway in the originating zone should be contacted.
9. A method as claimed in claim 1 wherein the first zone is associated with a first enterprise and a second zone is associated with a second enterprise.
10. A method as claimed in claim 1 wherein the identifiers are of a type selected from telephone numbers, universal resource identifiers (URLs), email addresses or any other suitable type of H.323 standard alias.
11. (cancelled)
12. A method as claimed in claim 1 wherein the request is an H.323 admission request.
13. A method as claimed in claim 1 wherein the reply is an H.323 admission confirm message.

14. A method as claimed in claim 1 wherein each gateway is unaware of which terminals are connected to other gateways in the communications network.

15. A method as claimed in claim 1 wherein said gatekeeper further comprises information about which terminals are accessible from each gateway together with cost information associated with accessing those terminals from each gateway.

16. A method as claimed in claim 15 wherein said reply comprises information about each gateway that can be used to access the destination terminal together with associated cost information.

17. A method as claimed in claim 16 wherein said reply comprises a list of said gateways in order of the associated costs.

18. A gatekeeper arranged for use in a packet-based communications network comprising a plurality of terminals connected to a plurality of gateways and wherein identifiers are associated with each terminal and each gateway has a packet network address, said gatekeeper comprising:-

(i) a data store arranged to store information about each gateway in the communications network, said information comprising the identifier of each terminal connected to that gateway and the packet network address of that gateway;

(ii) an input arranged to receive a request from an originating gateway in the communications network, said request comprising an identifier of a destination terminal;

(iii) a processor arranged to determine the packet network address of at least one and possibly more gateways which can be contacted to reach the destination terminal;

- (iv) an output arranged to send a reply to the originating gateway, said reply comprising the packet network address of at least one and possibly more gateways which can be contacted to reach the destination terminal;

wherein said communications network comprises a first zone and a second zone each comprising a plurality of terminals connected to a plurality of gateways and wherein a plurality of the terminal identifiers of the first zone are also used for terminals of the second zone.

19. A gatekeeper as claimed in claim 18 wherein said data store is further arranged to store cost information relating to the cost of accessing each available terminal from each gateway.

20. A gatekeeper as claimed in claim 18 wherein the processor is arranged to determine said packet network address on the basis of said destination terminal identifier.

21. A gatekeeper as claimed in claim 19 wherein said request further comprises the packet network address of the originating gateway connected to the originating terminal, and the processor is arranged to determine said packet network address of at least one and possibly more gateways which can be contacted to reach the destination terminal on the basis of the packet network address of the originating gateway as well as the destination terminal identifier.

22. A gateway arranged for use in a packet-based communications network comprising a plurality of terminals connected either to the gateway or to second gateways and wherein identifiers are associated with each terminal, said communications network further comprising a gatekeeper having information about each gateway comprising an identifier for each terminal connected to that gateway and a packet network address of that gateway, said gateway comprising:-

- (i) a processor arranged to issue a request to the gatekeeper, said request comprising an identifier of a destination terminal;
- (ii) an input arranged to receive a reply from the gatekeeper, said reply comprising the packet network address of at least one and possibly more of the second gateways which can be contacted to reach the destination terminal;

wherein said communications network comprises a first zone and a second zone each comprising a plurality of terminals connected to a plurality of gateways and wherein a plurality of the terminal identifiers of the first zone are also used for terminals of the second zone.

23. A gateway as claimed in claim 22 wherein said request comprises the packet network address of the gateway.

24. A gateway as claimed in claim 22 wherein said reply comprises cost information.

25. A communications network comprising a gateway as claimed in claim 22.

26. A communications network comprising a gatekeeper as claimed in claim 18.

27. A computer program for controlling a gatekeeper which is arranged for use in a packet-based communications network comprising a plurality of terminals connected to a plurality of gateways and wherein identifiers are associated with each terminal and each gateway has a packet network address, said computer program being arranged to control said gatekeeper such that:-

(i) information is stored about each gateway in the communications network said information comprising the identifier of each terminal connected to that gateway and the packet network address of that gateway;

(ii) the packet network address of at least one and possibly more gateways which can be contacted to reach a destination terminal may be determined; and

(iii) in response to requests received from gateways in the communications network, said requests comprising an identifier of a destination terminal, a reply is sent to the requesting gateway, said reply comprising the packet network address of at least one and possibly more gateways which can be contacted to reach the destination terminal;

wherein said communications network comprises a first zone and a second zone each comprising a plurality of terminals connected to a plurality of gateways and wherein a plurality of the terminal identifiers of the first zone are also used for terminals of the second zone.

28. A computer program for controlling a gateway in order to contact a destination terminal from an originating terminal via a packet-based communications network which comprises a plurality of terminals connected either to the gateway or to second gateways and further comprising a gatekeeper, said gatekeeper having information about each gateway comprising an identifier for each terminal connected to that gateway and the packet network address of that gateway, said computer program being arranged to control the gateway such that:-

(i) a request is sent from the gateway to the gatekeeper, said request comprising the identifier of the destination terminal;

(ii) a reply is received at the gateway from the gatekeeper said reply comprising the packet network address of one and possibly more of the second gateways which can be contacted to reach the destination terminal;

wherein said communications network comprises a first zone and a second zone each comprising a plurality of terminals connected to a plurality of gateways and wherein a plurality of the terminal identifiers of the first zone are also used for terminals of the second zone.

Evidence Appendix and Related Proceedings Appendix

There are no such appendices.